

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ALICIA THOMAS,

Plaintiff,

v.

UNITED PARCEL SERVICE, INC.,

Defendant.

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CIVIL ACTION NO. 4:20-CV-02929

JOINT STATUS REPORT AND CHRONOLOGY

Pursuant to the Court's Orders (Doc. No. 4; Doc. No. 6), Plaintiff Alicia Thomas and Defendant United Parcel Service, Inc. file this Joint Status Report and Chronology, and respectfully state the following:

The Parties exchanged disclosures pursuant to this Court's Order (Doc. No. 4). Plaintiff has agreed to supplement her Disclosures to provide additional information and/or documentation regarding the amounts of income she earned since her employment with Defendant ended and the records for each visit with mental and physical health professionals that she says is causally related to her employment.

The Parties request permission to conduct additional written discovery about Plaintiff's claims, Plaintiff's alleged damages, and Defendant's affirmative defenses, and then proceed with depositions.

Additionally, the Parties agree to the following chronology:

1. On January 16, 2018, Plaintiff began working for Defendant as a Local Sort Clerk.
2. On July 25, 26, and 29, 2019, Plaintiff failed to come to work.

3. On July 30, 2019, Defendant sent a letter to Plaintiff, warning that her failure to respond to the letter within 48-hours would result in her immediate separation. Plaintiff did not come to work after July 30, 2019.

4. On August 5, 2019, Defendant sent a letter to Plaintiff, notifying her that her employment was terminated because she failed to report to work within 48 hours of the July 30, 2019 letter.

Respectfully submitted,

/s/ Jamie J. Gilmore

Jamie J. Gilmore
Texas SBN: 24045262
Email: jgilmore@galyen.com
Brittney L. Thompson
Texas SBN: 24104618
Email: bthompson@galyen.com
BAILEY & GALYEN
1300 Summit Avenue, Suite 650
Fort Worth, Texas 76102
Phone: 817-276-6000
Fax: 817-276-6010

**ATTORNEYS FOR PLAINTIFF
ALICIA THOMAS**

/s/ Devin S. Vasquez

Michael D. Mitchell
Texas SBN: 00784615
USDC SD/TX: 15330
Devin S. Vasquez
Texas Bar No. 24098543
S.D. Texas No. 3027141
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
500 Dallas Street, Suite 3000
Houston, Texas 77002
713-655-5756 (Phone)
713-655-0020 (Fax)
michael.mitchell@ogletree.com
devin.vasquez@ogletree.com

**ATTORNEYS FOR DEFENDANT
UNITED PARCEL SERVICE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2020, a true and correct copy of the foregoing document was served on the following counsel of record in accordance with the Federal Rules of Civil Procedure:

Jamie J. Gilmore
Brittney L. Thompson
Bailey & Galyen
1300 Summit Avenue, Suite 650
Fort Worth, Texas 76102

/s/ Devin Vasquez

Devin S. Vasquez

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